

DMP:CRH/JMH/EMS
F.#2017R00906

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

v.

FILED EX PARTE,
IN CAMERA AND UNDER SEAL

HU JI,
LI MINJUN,
TU LAN,
ZHU FENG,
also known as "Johnny Zhu,"
KUANG ZEBIN,
MICHAEL MCMAHON,
ZHAI YONGQIANG,
ZHENG CONGYING, and
ZHU YONG,
also known as "Jason Zhu,"

21-CR-265 (PKC)

Defendants.

-----X

GOVERNMENT'S MEMORANDUM IN SUPPORT OF ITS CLASSIFIED
EX PARTE, IN CAMERA MOTION FOR A PROTECTIVE ORDER PURSUANT TO
SECTION 4 OF THE CLASSIFIED INFORMATION PROCEDURES ACT AND
RULE 16(d)(1) OF THE FEDERAL RULES OF CRIMINAL PROCEDURE

BREON PEACE
United States Attorney
Eastern District of New York

CRAIG R. HEEREN
J. MATTHEW HAGGANS
ELLEN M. SISE
Assistant U.S. Attorneys
(Of Counsel)

JAY I. BRATT
Chief, Counterintelligence and
Export Control Section (CES)
National Security Division
U.S. Department of Justice

SCOTT A. CLAFFEE
Trial Attorney, CES
Special Assistant U.S. Attorney